

***United States Court of Appeals
for the Second Circuit***



**BRIEF FOR
APPELLANT**

74-1550 ORIGINAL

To be argued by
THEODORE ROSENBERG
Time: 20 minutes

B

In The
United States Court of Appeals
For The Second Circuit

P/S

UNITED STATES OF AMERICA,

Appellees,

vs.

FRANK PUGLIESE,

Appellant.

APPELLANT'S BRIEF

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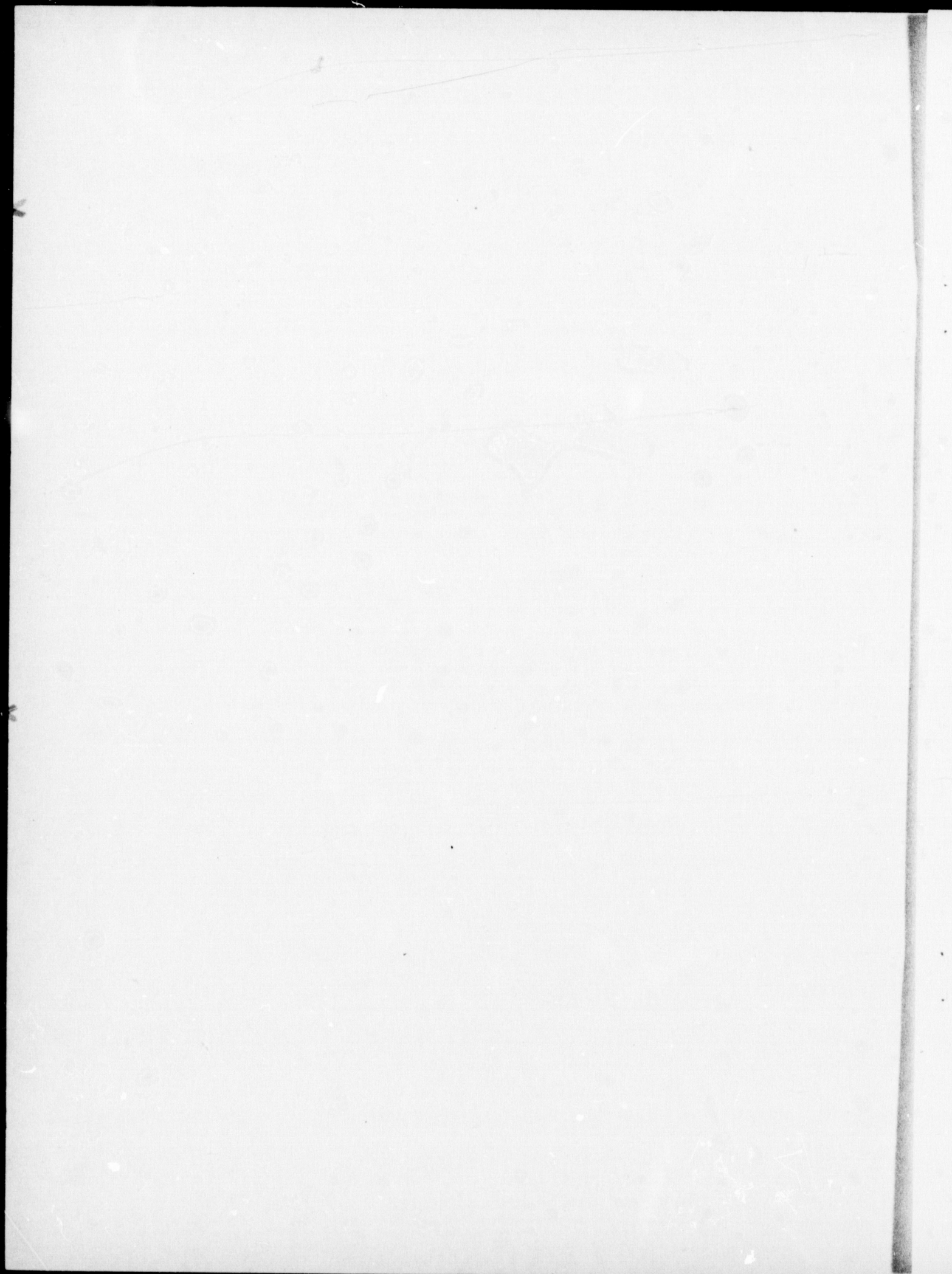
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UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

- - - - -x

THE UNITED STATES OF AMERICA,

Appellees,

-against-

FRANK PUGLIESE,

Appellant.

- - - - -x

APPELLANT'S BRIEF

PRELIMINARY STATEMENT

The defendant-appellant Frank Pugliese¹ appeals from the Judgments entered against him on May 10th, 1974, in the United States District Court for the Southern District of New York, following his trial by jury and convictions for Conspiracy to violate the Federal Narcotic Laws, 21 U.S.C. § 812, 841(a)(1) and 841(b)(1)(A) and three (3) substantive counts of distribution and

¹ Hereinafter referred to as "Pugliese".

and possession with intention to distribute of a Schedule I narcotic drug, heroin.

The Honorable Kevin Thomas Duffy, District Judge, imposed four (4) concurrent sentences of ten (10) years and a special parole of three (3) years.

THE INDICTMENT AND VERDICTS

The indictment filed in the United States District Court for the Southern District of New York, S73 Cr. 1099, embraced thirty counts, covered a period from January 1st, 1969, to the fall of 1973, and named thirty-three indicted defendants. In Bills of Particulars filed by the Government an additional thirty-five unindicted co-conspirators were named. By the time of trial there were eighteen defendants. Joseph Marchese was granted a Rule 29, F.R.C.P. acquittal. Al Greene was severed during trial because of serious injuries sustained as a result of an accident. The jury disagreed on a verdict for Benjamin Tolopka and all other fifteen defendants were convicted as charged with the exception of bifurcated Court Two, charging Louis Inglese with a continuing criminal narcotic enterprise under 21 U.S.C. § 848.

Pugliese was joined in the conspiracy (Count One) to violate the Federal Narcotic Laws, specifically 21 U.S.C. §§§ 812, 841(A)(1) and 841(b)(1)(A) and charged in three substantive counts for the sale of one-eighth kilogram of heroin, May, 1971, (Count Sixteen), one-half kilogram of heroin, September, 1971, and (Count Eighteen) another half kilogram of heroin, also in September (County Twenty).

The jury returned verdicts of guilty against Pugliese on all counts.

THE GOVERNMENT'S THEORY OF
THE CASE AS TO PUGLIESE

The Government sought to prove that Pugliese joined the conspiracy in March, 1970. He was portrayed by the prosecution as a middle echelon figure in the narcotics trade servicing customers in the Bronx and Washington, D.C.

The thrust of the Government's case would be to show that when Pugliese, a violent person, was sent to jail he did not disengage his narcotic enterprise but left money and heroin to fugitive-defendant Pat DiLacio and

Government informer Harry Pannirello, an unindicted conspirator and prosecution witness. Pugliese left instructions that DiLacio obtain heroin from his wholesale supplier DiNapoli, and Pannirello would make the wholesale distributions. To sustain their prosecution theory against Pugliese the Government rested their case on the testimony of three informers, Pannirello, Barnaba and Dawson.

All three Government witnesses would claim that they anticipated consideration for their trial testimony against Pugliese in view of their guilty pleas to serious narcotic offenses. Notwithstanding the fact that they admitted their active participation in an extended narcotic trade and their lies and efforts at covering their criminal activities, they testified to detailed transactions with Pugliese covering a period from 1970, to Pugliese's incarceration and the legacy the Government claimed he left in order to protect his commercial interests in the distribution and sale of heroin for profit.

STATEMENT OF FACTS

- (a) February to June, 1970: Pannirello and
Pugliese Connect: Three Heroin Deliveries.

Harry Pannirello met defendant Frank Pugliese known to him as the time as "Butch" during February or March, 1970 (14, 2117-2118).² Pannirello told Pugliese he needed money. Pugliese asked him if he wanted to stash or hold narcotics for him. Pannirello agreed and Pugliese subsequently turned over to him seven packages in plastic containers each containing a white powder. Each of the seven packages contained an eighth. The total amount received by Pannirello from Pugliese was seven-eighths (14, 2117-2120). Pannirello stored the narcotics in the attic of his house (14, 2120).

At the end of March or beginning of April, 1970, at Pugliese's telephone request, Pannirello recalled that he delivered one of the packages to him (14, 2122) at 170th Street and University Avenue. The delivery

² The references are to the "Defendants-Appellants' Joint Appendix." References to the trial record itself will carry only the pagination preceeded by the volume number in parenthesis. Thus, "(Vol. #--)."

was made in an automobile. Pannirello then saw Pugliese enter a building and an elevator at that address (14, 2123). Pugliese returned some twenty minutes later and gave Pannirello \$200 for his trouble (44, 2123).

Two or three weeks later, Pannirello estimated April, 1970, Pugliese called Pannirello and asked him to bring two "shirts" (meaning packages) to the same location at University Avenue. When he arrived, Pugliese was there and they both went into the building at 1380 University Avenue (14, 2124). They went to the eleventh floor, defendant Hattie Ware's apartment. Present besides Pugliese, Pannirello and Ware were defendant Basil Hansen and his girlfriend Bunny (14, 2125). Pannirello removed the package from his jacket, laid it on a coffee table in the living room. Hansen and Pugliese went into the bedroom and then exited. Pannirello received \$200 from Pugliese for his efforts. In the same building, Pugliese and Pannirello then went to the seventh floor and met with defendant Al Greene (14, 2127). Pugliese told Greene that Pannirello would be making deliveries for him and Greene agreed (14, 2128).

Approximately three weeks later, Pannirello delivered

the remaining four eighth packages to Pugliese at his home in the Bronx (14, 2129).

Sometime in June, 1970, after not hearing from Pugliese for a while, he finally called and Pannirello went down to see him at Pugliese's construction office in the Bronx. Pugliese gave him what he estimated was a thousand dollars worth of fireworks to cover \$400.00 Pugliese owed Pannirello plus another \$600.00 bonus he could earn on the sale of the fireworks (14, 2129).

(b) June 1971: Pugliese and Pannirello Visit
DiNapoli; Pannirello Fails to Identify
DiNapoli.

Sometime prior to June, 1971, Pannirello believed that Pugliese had told him that he was DiNapoli's partner in drugs (14, 2131). Later Pannirello maintained that Pugliese only insinuated it (18, 2551-2552) and then admitted that in September or October, 1971, Pugliese had not told him his source of heroin supply (18, 2564).

Sometime in June, 1971, Pugliese asked Pannirello to ride over with him to DiNapoli's girlfriend's house on Bronxdale Avenue in order to bring him some money (14, 2131). Pannirello went with Pugliese. He met

DiNapoli's girlfriend and Joseph DiNapoli. They sat around a coffee table in the living room and saw Pugliese place about eight or ten thousand dollars on the coffee table. DiNapoli started to count it and then pushed the money aside (14, 2132). When asked if he saw anyone resembling DiNapoli in the courtroom, he looked at the line-up of assembled lawyers and defendants and stated no (14-2132).

The following day Pannirello made an in-court identification of DiNapoli (CF. DiNapoli brief).

(c) Pugliese Introduces Pannirello to Additional Customers and Associates.

In June, 1971, Pannirello claimed that Pugliese introduced him to Hank also known as John Springer, a defendant, (14, 2133-2136). Pugliese, according to Pannirello, maintained that Springer was a partner in narcotics with Paul Gregorio also known as Paulie the Arrow. At the time, in Pannirello's presence, Pugliese asked Gregorio for the money he owed him. Gregorio said he did not have it but would pay Pugliese as soon as he did (14, 2135).

In July, 1971, Pannirello remembered seeing Pugliese once at Seaside Heights on the New Jersey shore. He was introduced to fugitive-defendant Pat DiLacio (14, 2139-2140). He told Pannirello to get to know DiLacio "real well." (14, 2139).

In August, 1971, Pugliese introduced Pannirello to Government informer Thomas Dawson in the Bronx (14, 2139). Dawson was known as "Tennessee" and resided in Washington, D.C. When they met Dawson, Pugliese asked Pannirello to go to his car and pick up a package of a half a kilo of heroin. Pannirello handed him the package and Dawson delivered the item over to someone in his car. In return he received a package containing \$16,000 which Pannirello placed in Pugliese's car. Pannirello received \$500 as payment for his assistance (14, 2143-2144).

In September, 1971, Pannirello was introduced to Government informer John Barnaba by Pugliese at his Bronx apartment (14, 2145). Pugliese and Barnaba boasted how they ripped off someone for \$5,000. on a bad package of heroin (14, 2146). During this month and October, 1971, Pannirello continued to furnish heroin from Pugliese to Greene, Hansen and Dawson (14, 2147). The deliveries

averaged anywhere from a quarter to half a kilo. Deliveries to Greene and Hansen were made at the apartment dwelling on 170th Street and University Avenue in the Bronx (14, 2147-2149).

(d) The October, 1971 Meeting - Pugliese Bequeaths the Business: Goes to Jail

In October, 1971, Pugliese realized that he was going to jail (14, 2152). According to Pannirello, Pugliese called for a meeting at the Pelham Parkway apartment of his drug associate or partner Pat DiLacio (14, 2153). Pannirello, DiLacio and Pugliese assembled and Pugliese told them he was going to leave them two kilos of heroin. Pat DiLacio would pick up the heroin and take it to an unnamed stash. Pannirello would make the deliveries to the customers (14, 2154). Out of the business each would draw \$500.00 apiece every month (14, 2155). Pugliese gave DiLacio DiNapoli's telephone number. Pannirello would not have anything to do with DiNapoli. DiLacio would obtain drugs from DiNapoli and Pannirello would make deliveries to customers (14, 2158). The cost per kilo was \$22,000 (14, 2158). DiLacio was to

pay DiNapoli (14, 2159a). Government informer Barnaba was to get special treatment on sales of heroin. The United States attorney drew the jury's attention to Pugliese's imprisonment (36, 5048).

(e) Distributing Two Kilos of Heroin
October - December, 1971.

At the October, 1971 meeting, Pugliese instructed DiLacio to pick up two kilos of heroin from DiNapoli and to stash them in Pugliese's garage. Pannirello telephoned Dawson on Pugliese's instructions and told him to come up the following night from Washington, D.C. (14, 2166).

Pannirello went the following night to Pugliese's garage and from a gym bag took out half a kilo which he delivered to Dawson (14, 2167). Dawson gave him \$16,000 which he split \$8,000 with DiLacio and the rest of the money was placed in a suitcase in a closet in DiLacio's apartment (14, 2167).

Just prior to Pugliese's departure to prison a gathering of friends took place. Among those present were Barnaba, Gamba and a "Joe Sharp", also known by his true name as Joseph A. LaSaiata (14, 2169). Pannirello

proceeded to identify Gamba, also known as "Sinatra", as a person introduced to him by Pugliese and who was a stash for Pugliese and later for Pannirello (14, 2169). The following day Pugliese went to jail and present in Court to see him off were Pannirello, Barnaba, Hansen and others (14, 2170).

Of the one and a half kilos left, half of it went to Barnaba and the rest to Greene and Hansen (14, 2170).

(f) The Shooting of Paul Gregorio, also known as Paulie the Arrow.

Having told the jury that Pugliese gave up his narcotic enterprise only because of his forced departure to prison, the Government introduced evidence not only that Pugliese was a professional criminal but that to collect moneys due him from heroin sales he employed violence.

Dawson claimed he knew Paul Gregorio since February 20th, 1971 (19, 2603). He met him at Warren Robinson's Haberdashery in Washington, D.C. Gregorio was arguing at the time with Robinson about moneys owed him (19, 2604). Gregorio claimed he owed a person named "Georgie"

money for purchases of narcotics. "Georgie" was later identified by Dawson as Pugliese (19, 2605). Dawson said he would help his friend Robinson and pay Gregorio so that he in turn could meet his obligations to Pugliese (19, 2608). Dawson finally met Pugliese personally and was advised by the latter that Gregorio "had messed up in the past." (19, 2608). Dawson went only to describe in his testimony a number of narcotic transactions with Pugliese.

It was Barnaba who testified that he had heard from Fobrick that Pugliese had shot Paulie "the arrow" Gregorio in the leg in an attempt to enforce the collection of moneys due him on narcotic purchases (10, 1420; 36, 5101-5102). Barnaba never claimed that this information came to him from Pugliese. Dawson related the same story and the point did not escape the United States attorney in his summation (36, 5047); (5101-5102).

(g) Joe Sharp's Garage: Heroin or Football tickets.

Joseph A. LaSalata was called as a witness by the Government against Pugliese as part of their direct case. He claimed that he was also known as "Joe Sharp" (25,

3294) and that he knew Pugliese. Shortly after labor day in 1971, and after he moved to the Bronx, he met with Pugliese on his way home from work on Crosby Avenue. As a result of that conversation he rented Pugliese a garage in October, 1971 (25, 32963297). The rental of \$25 was paid to Mrs. LaSalata (25, 3297). LaSalata testified that Pugliese did not put a car in his garage but instead a box was placed in the garage. After renting the garage, LaSalata noticing that Pugliese had not used it for his car asked him if he intended to use the garage. If not he had someone else he could rent the garage to. He further told Pugliese that he noticed that he had placed a box in the garage and if he wasn't going to take the garage he should take the box out (25, 3298). Pugliese told him well the box doesn't actually belong to him but to a person named John, who LaSalata had previously met and later identified as Barnaba (25, 3310). LaSalata then told Pugliese that John should come over and remove the box. John called LaSalata one evening and indicated he would pick up and remove the stuff in the box, referring to the contents as bags (25, 3299). One night in fact John did come

over to his house at 1606 Marcy Avenue and said he would remove one but not all of the bags and asked LaSalata to bring it out to him, which he did. John promised he would return for the balance the following day or the day after (25, 3300). LaSalata described the bag as an ordinary brown paper bag which was sealed. Pugliese had told LaSalata that there were football tickets in the bag (25, 3302). John returned on two other occasions and received from LaSalata two other bags (25, 3302-3303). On the last occasion John paid LaSalata \$100 and that was the last time he saw him (25, 3304). LaSalata denied that he had ever been engaged in drugs, much less with Barnaba or Pugliese (25, 3312).

Mrs. LaSalata was then called by the Government as a witness. She confirmed that in October, 1971, Pugliese had rented a garage from her at a monthly rental of \$25, and that he never placed an automobile in the garage (25, 3347). A week later Pugliese returned and placed a box in the garage (25, 3347). Mrs. LaSalata was asked by the United States attorney if during the course of the instant trial, February 9th, 1974, Pugliese had come to her home. She answered yes and indicated that he had

asked for her husband who she said was not at home. Pugliese asked her to have Mr. LaSalata call him or his lawyer (25, 3349). Pugliese returned that evening on four different occasions, rang her bell, but she did not answer. Her telephone rang consistently. Pugliese continued his efforts to see her and her husband (25, 3350-3352).

(h) The Defense.

Pugliese did not testify nor offer any defense.

ARGUMENT

POINT I

THE PORTRAYAL OF PUGLIESE AS A PROFESSIONAL CRIMINAL, A MAN OF VIOLENCE AS DEPICTED IN HEARSAY STATEMENTS THAT HE SHOT PAULIE THE ARROW, HIS INVOLVEMENT AS DI NAPOLI'S PARTNER IN SHYLOCKING, AND THAT HE WENT TO PRISON DURING THE PERIOD OF THE CONSPIRACY REQUIRES
REVERSAL.

The Government produced three witnesses who testified as to narcotic transactions with Pugliese. Barnaba, Pannirello and Dawson each pleaded guilty to felonious violations of the narcotic laws. Each awaited sentence

and practically faced a life-time of imprisonment. The defense argument was that none testified out of repentance or regret. Each cooperated with the thought of pleasing their prospective jailer so that their terms of imprisonment, if any, might be lessened. Their undeviating hope was that through their efforts at cooperation they might escape their just punishment by sending their friends and others to jail.

Appreciating the defense argument, the Government set upon a course of portraying Pugliese as a professional criminal on his way to prison who would enforce by violence and at the point of a gun the collection of moneys owed to him as a result of narcotic transactions. Barnaba testified that he heard Fobrick say that Pugliese shot Paulie "the Arrow" Gregorio in order to enforce the payment of a narcotic debt (10, 1420). This statement was also alluded to by Dawson and repeated on Government summation by the United States attorney (36, 5047; 5101-5102).

Furthermore, the Government was permitted over prior objection to advise the trial jury that Pugliese was to leave his narcotic trade to Pannirello and DiLacio for

the simple reason that he was on his way to prison. The Government even adduced proof of a farewell party and the Court scene when Pugliese was remanded.

DiNapoli faced with the seizure of a million dollars on February 3rd, 1972, and its introduction into the evidence at trial was obliged to tell the trial jury that he was a shylock and a person who through force and violence collected money loaned by him. The Government claimed that Pugliese was his partner in everything.

Pugliese never testified in his own behalf and did not put in a defense.

In United States v. Bynum, 485 F.2d 490, 503 (2nd Cir. 1973), this Court maintained it was not reversible error when a Government witness testified that one of the defendants had been in jail for several months. The Court in Bynum, supra, p. 503, stressed:

"The record discloses that the trial Judge promptly admonished the jury to disregard and completely erase the remark from their minds."

In Pugliese the trial Court not only failed to give such an instruction and prompt admonishment but in advance of the testimony after hearing defense objections upon

reflection permitted the evidence to come in. Considering the fact that Pugliese did not testify and thus did not place his own credibility in issue the statement was prejudicial and damaging.

In United States v. Stromberg, 268 F.2d 256, 269 (2nd Cir. 1959) Cert. denied, 361 U.S. 863, on cross-examination a Government witness was asked a question which which he replied he could not answer without an explanation. The Court ruled he might answer and in so doing the witness mentioned that the defendant was in jail. This Court again emphasized in Stromberg, supra, p. 269:

"There can be no doubt that the testimony above italicized was inadmissible; and to Behrman at least, it was also prejudicial. However, the answer was unforeseeable: plainly it had not been induced by the prosecution. The judge immediately struck out the testimony and instructed the jury to disregard it, adding, 'You are to pay no attention to that remark in any way. You are to disregard it completely.' And the incident was an isolated one during the course of a long trial. These considerations distinguish the case from United States v. Tomalolo, 2 Cir. 249 F.2d 683, at page 695, where reversal was based on an accumulation of errors. We are of the opinion that in the setting of this case the prompt instruction to disregard the answer cured

the error. *United States v. Giallo*, 2 Cir., 206 F.2d 207, affirmed 346 U.S. 929, 74 S. Ct. 319, 98 L.Ed. 421; *United States v. Curzio*, 3 Cir. 179 F.2d 380; see *United States v. Apuzzo*, 2 Cir. 245 F.2d 416, certiorari denied 355 U.S. 831, 78 S. Ct. 45, 2 L.Ed. 2d 43."

In Pugliese by clear design the Court permitted the prosecutor to place this fact in evidence before the trial jury.

There was no excuse for the introduction of this evidence as part of the Government's case in order to show that in October, 1971, Pugliese turned the business over to DiLacio and Pannirello because he was going to prison. Another solution, consistent with the truth was possible and palatable such as Pugliese leaving elsewhere or relocating with a proper admonishment to the jury that they were not to concern themselves with this or speculate as to the reasons.

Absent in this case was the necessity to show criminal disposition or violence on the part of Pugliese as existed under the circumstances in *United States v. Bynum*, supra, pp. 498-499. There the crimes of violence were actually part of the planning to obtain new drugs to supply a market and to cover the covert nature of the

conspiracy. While Bynum, p. 499, maintained that in such a "'large scale' undertaking . . . corruption and violence are endemic ", this certainly was not the rationale in Pugliese for the prosecution, without justification, to introduce at random a crime of violence and thus obviate the careful considerations of United States v. Byrd, 352 F.2d 570 (2nd Cir. 1965); United States v. Deaton, 381 F.2d 114 (2nd Cir. 1967), and United States v. Peoni, 100 F.2d 401 (2nd Cir. 1938).

In this instance there was no witness that testified to the shooting. Barnaba claimed he heard it from a third party and there was no claim by the Government that Pugliese discussed it with any other co-conspirator or that it was a general criminal undertaking by this specific conspiracy. To paraphrase Bynum, supra, p. 498, this was an attempt by the Government to depict Pugliese as a wanton criminal to establish to the jury that a wicked man was in the dock not given to extramural frolics.

Those who heard and saw Mrs. LaSalata testify filled with fear and intimidation as to how Pugliese during the course of trial persisted in seeing her husband, the door-

bell buzzing and the telephone ringing, fully appreciated the Government's contention stressed at the final hour of their summation that Pugliese was a man of violence.

POINT II

PUGLIESE JOINS PURSUANT TO RULE 28(1)
F.R.A.P. WITH APPELLANT DI NAPOLI'S
POINT ONE REFERENCE OF THE DENIAL OF
THE SUPPRESSION OF THE MILLION DOLLAR
SEIZURE.

Pugliese joins in the DiNapoli brief on its statement of facts and Fourth Amendment suppression argument with regard to the seizure of the one million dollars on February 3rd, 1972. The Government offered the million dollars on the conspiracy theory in which Pugliese was joined in Count One.

POINT III

PUGLIESE JOINS PURSUANT TO RULE 28(1)
F.R.A.P. WITH APPELLANT DI NAPOLI'S
POINT TWO REFERENCE THE COURT'S FAILURE
TO EXCLUDE ON GROUNDS OF INADMISSIBILITY
THE MILLION DOLLARS AND WITH APPELLANT
INGLESE'S BRIEF THAT AT THE MAXIMUM
ONLY A PORTION OF THE MILLION DOLLARS
SHOULD HAVE BEEN ADMISSIBLE.

POINT IV

PUGLIESE JOINS PURSUANT TO RULE 28(1)
F.R.A.P. WITH APPELLANT GAMBA'S CON-
TENTIONS WITH RESPECT TO IMPROPRIETIES
IN THE SELECTION OF THE JURY.

POINT V

PUGLIESE JOINS PURSUANT TO RULE 28(1)
F.R.A.P. WITH APPELLANT'S MAMONE AND
DI NAPOLI'S BRIEFS AS TO THE PREJUDICIAL
EFFECT OF GOVERNMENT'S SUMMATION.

Particular attention is called to the fact that the United States attorney, in addition to placing his own credibility in issue, advised the jury that Judge Duffy and the Federal Judge in New Jersey would not permit them Government informers to frame innocent people (36, 5056):

"Well, accept that for the purposes of this argument. Accept it, to help himself with Judge Duffy, Dawson, the other federal judge in New Jersey. Can they help themselves by framing innocent people, committing perjury? No way. No way."

POINT VI

PUGLIESE JOINS PURSUANT TO RULE 28(1)
F.R.A.P. WITH APPELLANT'S INGLESSE'S
BRIEF THAT THE CONVICTION REQUIRES RE-
VERSAL ON THE THEORY THAT ALTHOUGH THE
GOVERNMENT ALLEGED A SINGLE CONSPIRACY
MULTIPLE CONSPIRACIES WERE PROVED.

POINT VII

PUGLIESE JOINS PURSUANT TO RULE 28(i)
F.R.A.P. WITH ALL OTHER POINTS RAISED
BY CO-APPELLANTS IN THEIR RESPECTIVE
BRIEFS AS MAY BE APPLICABLE TO HIM.

CONCLUSION

For the reasons set forth herein and those joined
in co-appellant's briefs pursuant to Rule 28(i), F.R.A.P.,
Pugliese moves to reverse the judgments entered against
below and for a new trial.

Respectfully submitted,

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U.S. COURT OF APPEALS: SECOND CIRCUIT

Index No.

U.S. A.

Appellee,

against

DUGLIESE,

Appellant.

Affidavit of Personal Service

STATE OF NEW YORK, COUNTY OF NEW YORK

ss.:

I, Victor Ortega,

being duly sworn,

deposes and says that deponent is not a party to the action, is over 18 years of age and resides at

1027 Avenue St. John, Bronx, New York

That on the 19th day of August 1974 at FOLEY Square, New York

deponent served the annexed Appellants Brief upon

PAUL J. Curran - U.S. Attorney - Southern Dist. -

Attorney for Appellee

the in this action by delivering a true copy thereof to said individual personally. Deponent knew the person so served to be the person mentioned and described in said papers as the Attorney(s) herein,

Sworn to before me, this 19th

day of August 19 74

Victor Ortega
Print name beneath signature

VICTOR ORTEGA

Robert T. Brin

ROBERT T. BRIN
NOTARY PUBLIC, STATE OF NEW YORK
NO. 31 - 0419950
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES MARCH 30, 1975

r.

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